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CENTER FOR BIOLOGICAL DIVERSITY

STATE OF CALIFORNIA
State Energy Resources
Conservation and Development Commission

In the Matter of:)	Docket No. 07-AFC-6
)	
)	CENTER FOR
APPLICATION FOR CERTIFICATION)	BIOLOGICAL
of the CARLSBAD ENERGY CENTER)	DIVERSITY'S DATA
PROJECT)	REQUESTS TO THE CECP
_____)	

Intervenor Center for Biological Diversity ("the Center") hereby submits this first set of Data Requests to the Carlsbad Energy Center Project ("CECP") pursuant to 20 Cal. Code Reg. § 1716(b). Any objections or statements of inability to comply with the request must be filed in writing with the Committee and with the Center within 10 days of receipt of this request. (20 Cal. Code Reg. § 1716(g))

Dated: September 26, 2008



William Rostov
Attorney for Intervenor Center for Biological
Diversity

Technical Area: Air Quality

Background

The California Global Warming Solutions Act of 2006 (AB 32) and related Executive Orders have set aggressive goals for the State to significantly reduce its greenhouse gas emissions over the next several decades. This includes attention to emissions generated outside the state by power that is ultimately used in California. Yet the Applicant only partially analyzed certain greenhouse gas emissions from the new project.

1. Please provide a full greenhouse gas inventory of direct and indirect emissions sources from the project, including building materials, construction emissions, operational energy use, vehicle trips, water supply, and waste disposal.
2. Please estimate the amount of HFC, PFC, and SF₆ that will be emitted by the CECP.
3. Please discuss mitigation measures to prevent the release of HFC, PFC, and SF₆.

Background

The San Diego Air Pollution Control District noted in its October 17, 2007 information request that, “It is likely that the project may be operated continuously or intermittently on natural gas derived from imported liquefied natural gas (LNG).” The processes necessary to convert and transport LNG are very energy intensive and could significantly increase California’s current emissions from domestic sources of natural gas.

1. Will the CECP use imported LNG?
2. If so, please estimate the amount of LNG the CECP will use on an annual basis.
3. What are the factors that will dictate “intermittent” or “continuous” use of LNG at the CECP?
4. Please identify the LNG terminal or terminals that will provide gas for the CECP. Please list the county or countries of origin of the LNG to be shipped to these terminal(s). Estimate the relative amount of LNG that will be transported from each country of origin.
5. Please estimate the full lifecycle carbon footprint of the use of LNG, including the impacts of extraction, liquefaction, transportation, and regasification of the imported LNG to be used.

Background

Section 5.1 of the Application for Certification (“AFC”) calculates certain greenhouse gas emissions from specific elements of the project (the new equipment and the existing Units 1, 2, and 3). The calculations estimate that the CECF will emit 8.50×10^5 metric tons of carbon dioxide equivalent emissions. In City Data Response 50, the Applicant concludes that the project will only lead to “a net increase in GHG emissions of approximately 2.08×10^5 metric tons per year of carbon dioxide equivalent GHGs” based on assumptions about the benefits of shutting down Units 1, 2, and 3. However, this calculation neglects several potentially significant sources of greenhouse gases from the project and seriously underestimates the actual emissions that could result from this project, while potentially overestimating the benefits of retiring Units 1, 2, and 3. Table 5.1B-20 of the AFC estimates the greenhouse gases from the to-be-retired Units 1, 2, and 3 “based on maximum 2-year annual average with a 10-year look back period.”

1. Since the AFC lists several conditions under which the CECF may operate once online (i.e., base load, load following, daily cycling, full shutdown), please confirm that the calculations of greenhouse gas emissions from the new equipment are based on the project’s maximum potential to emit.

2. Please provide the 2-year period relied upon to calculate emissions.

3. Please calculate greenhouse gases based on the most recent (current) 2-year average for each of these units, and for units 4 and 5. Please include the method used to calculate these emissions.

4. Please provide the breakdown of oil use versus natural gas use in these units over the past 2 years and the hours of use for each type of fuel. Also provide this information for units 4 and 5.

Background

Table 5.1B-12 of the AFC shows a significant decrease in NO_x and SO_x emissions from Units 1, 2, and 3 since 1995.

1. Please explain these decreases.

Background

The anticipated life expectancy of the proposed CECF is 40 years. Existing Units 1, 2, and 3 are already more than 50 years old, and Units 4 and 5 are over 30 years old.

1. Please provide an estimate of the remaining useful life of Units 1, 2, and 3, as well as Units 4 and 5, if the CECF were not constructed.

2. Would new permits be necessary in order to keep Units 1, 2, 3, 4, and 5 operating for this amount of time?

3. Please provide the annual hours of use for Units 1, 2, 3, 4, and 5 over each of the past 5 years (not the 5-year average). Also, please provide the annual capacity factor for each of the units over each of the past 5 years (not the 5-year average).

Background

The AFC states that one of the goals of the project is “meeting the expanding need for new, highly efficient, reliable electrical generating resources located in the load center of the San Diego region.”

1. What is the reliability need of the area? (Please include a numerical answer that identifies the number of megawatts necessary to meet existing reliability).

2. If the CECP will provide more than the reliability needs of the region, please discuss the ways in which the excess capacity provided by the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment and the impacts this growth may have on the environment including the potential increased emissions of greenhouse gases.

Background

The AFC does not appear to include analysis of an alternative that could meet the region’s reliability needs with a smaller facility.

1. Please provide an analysis of this alternative including a calculation of the potential greenhouse gas emissions.

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Attorneys for Intervenor
Center for Biological Diversity

STATE OF CALIFORNIA
State Energy Resources
Conservation and Development Commission

In the Matter of:

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) DOCKET NO: 07-AFC-6
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CARLSBAD ENERGY CENTER PROJECT

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) PROOF OF SERVICE
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)
)

California Energy Commission
Attn: Docket No. 07-AFC-6
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Proof of Service

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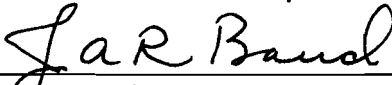
DECLARATION OF SERVICE

I, Jessie Baird, declare that on September 26, 2008, I deposited copies of the attached Center for Biological Diversity's Data Requests to the CECP, in the United States mail at Oakland, California, with first-class postage thereon fully prepaid and addressed to those identified on the Proof of Service list above.

OR

Transmission via electronic mail was consistent with the requirements of California Code of Regulations, title 20, sections 1209, 1209.5, and 1210. All electronic copies were sent to all those identified on the Proof of Service list above.

I declare under penalty of perjury that the foregoing is true and correct.



Jessie Baird